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14 GREGORY R. RAIFMAN and SUSAN
15 RAIFMAN, husband and wife, individually
16 and on behalf of their marital community
17 and as Trustees of the RAIFMAN FAMILY
REVOCABLE INTERVIVOS TRUST and
as beneficiaries of the PALLADIAN
TRUST; and GEKKO HOLDINGS, LLC,

18 Plaintiffs,

19 vs.

20 WACHOVIA SECURITIES, LLC, N/K/A
21 WELLS FARGO ADVISORS LLC,

22 Defendant.

Case No.: No. C 11-02885 SBA

**STIPULATION TO ENLARGE
PLAINTIFFS' TIME TO FILE
RESPONSES TO DEFENDANT'S
MOTION TO DISMISS AND MOTION
TO STRIKE AND FOR DEFENDANT
TO FILE ITS REPLIES**

Action filed: April 1, 2011

[Removed from California State Court]

Hon. Saundra B. Armstrong

1 Whereas, on May 8, 2013 Defendant filed its Motion to Strike Portions of the
2 Plaintiffs' Third Amended Complaint [Dkt. 153], and its Motion to Dismiss Plaintiffs' Third
3 Amended Complaint [Dkt. 155] in this action;

4 Whereas, Plaintiffs' Responses in opposition to the Motion to Dismiss and Motion to
5 Strike are due on May 22, 2013, and Defendant's Reply in support of each Motion are due on
6 May 29, 2013;

7 NOW, THEREFORE, the parties, through their counsel, hereby stipulate and agree
8 that, pursuant to Local Rule 6-1(b), that Plaintiffs shall have until and including May 29, 2013,
9 to file their Responses in opposition to the Defendant's Motion to Dismiss the Third Amended
10 Complaint and Defendant's Motion to Strike, and the Defendant shall have until and including
11 June 12, 2013 to file its Reply in support of each Motion. This extension will not alter the date
12 of any event or deadline already fixed by Court Order.

13 DATED: May 17, 2013 Tod Aronovitz
14 Barbara Perez
15 Andrew Zelmanowitz
16 ARONOVITZ LAW

17 /s/ Tod Aronovitz
18 Tod Aronovitz

19 Attorneys for Plaintiffs,
20 GREGORY R. RAIFMAN, SUSAN RAIFMAN
GEKKO HOLDINGS, LLC, and
HELICON INVESTMENTS, LTD.

21 DATED: May 17, 2013 Ronald E. Wood
22 Jennifer L. Roche
23 PROSKAUER ROSE LLP

24 /s/ Ronald E. Wood
Ronald E. Wood

25 Attorneys for Defendant,
26 WACHOVIA SECURITIES, LLC

1 PURSUANT TO STIPULATION, IT IS SO ORDERED
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DATED: 5/20/13

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5 Hon. Saundra J. Armstrong
United States District Judge

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